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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ALBERTO RUIZ-ZAMORA, AKA
LUIZ RUIZ,

Defendant.

CASE NO. 1:25-CR-00042-KES-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
AND ORDER

DATE: December 10, 2025
TIME: 1:00 p.m.
COURT: Hon. Barbara A. McAuliffe

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on December 10, 2025.
2. The parties have met and conferred and agree that the status conference should be continued to a later date. Defendant's counsel will need time to review the produced discovery. Accordingly, the parties' preference would be to set the case for a status conference on January 14, 2026.
3. By this stipulation, defendant now moves to continue the status conference until January 14, 2026, and to exclude time between December 10, 2025, and January 14, 2026, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
4. The parties agree and stipulate, and request that the Court find the following:

1 a) The government has represented that the discovery associated with this case
2 includes reports, audio recordings, and surveillance footage. All this discovery has been either
3 produced directly to counsel and/or made available for inspection and copying. The government
4 has also made a formal written plea offer to the defendant.

5 b) Counsel for defendant desires additional time to review the plea offer with her
6 client and discuss a pretrial resolution of the case with the government.

7 c) Counsel for defendant believes that failure to grant the above-requested
8 continuance would deny him/her the reasonable time necessary for effective preparation, taking
9 into account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of December 10, 2025 to January 14,
16 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
17 T4] because it results from a continuance granted by the Court at defendant's request on the basis
18 of the Court's finding that the ends of justice served by taking such action outweigh the best
19 interest of the public and the defendant in a speedy trial.

20 5. Nothing in this stipulation and order shall preclude a finding that other provisions of the
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
22 must commence.

23 IT IS SO STIPULATED.
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1 Dated: December 4, 2025

ERIC GRANT
United States Attorney

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3 /s/ CALVIN LEE
CALVIN LEE
Assistant United States Attorney

4
5 Dated: December 4, 2025

6 /s/ Laura Myers
Laura Myers
Counsel for Defendant
MIGUEL ALBERTO RUIZ-
ZAMORA, AKA LUIZ RUIZ

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11 **ORDER**

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13 IT IS SO ORDERED that the status conference is continued from December 10, 2025, to **January**
14 **14, 2026 at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe.** Time is
15 excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

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17 IT IS SO ORDERED.

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19 Dated: **December 4, 2025**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE